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9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JONATHAN GONZALEZ,

16 Defendant.

No. 2:24-CR-00158-JFW

STIPULATION TO CONTINUE PRETRIAL
MOTIONS HEARING

Current Hearing Date:
December 6, 2024, at 8:00 a.m.

Proposed Hearing Date:
December 20, at 8:00 a.m.

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18 Plaintiff United States of America, by and through its counsel
19 of record, the United States Attorney for the Central District of
20 California and Assistant United States Attorney Diane Roldán, and
21 defendant JONATHAN GONZALEZ ("defendant"), by and through his counsel
22 of record, Deputy Federal Public Defender Hannah Bogen, hereby
23 stipulate as follows:

24 1. On November 8, 2024, defendant filed a Motion to Suppress
25 Evidence and a Motion to Dismiss the Indictment. (Dkts. 24-27, 30-
26 31.)

27 2. On November 18, 2024, the government filed oppositions to
28 defendant's pretrial motions. (Dkts. 32, 33, 35.) In support of its

1 Opposition to defendant's Motion to Suppress, the government
2 submitted a declaration from Los Angeles Sheriff's Department Deputy
3 Carlos Martinez. (Dkt. 32-1.)

4 3. The hearing on defendant's pretrial motions is currently
5 set for December 6, 2024, at 8:00 a.m. (Dkt. 23.)

6 4. On November 21, 2024, Deputy Martinez learned of a critical
7 personal family matter that was scheduled for December 6, 2024, at
8 9:00 a.m., which would conflict with the hearing time. If the Court
9 requests, the government will describe the nature of this family
10 matter in an under-seal filing.

11 5. On November 22, 2024, the government informed defense
12 counsel of the conflict, as Deputy Martinez's testimony may be
13 required at the motions hearing. The parties then met and conferred
14 on alternative dates. Counsel for Mr. Gonzalez is unable to attend a
15 hearing on December 13, 2024, because she will be out of the state
16 for a nationwide Federal Public Defender week-long training.

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6. The parties have met and conferred and respectfully request that the Court continue the pretrial motions hearing in light of Deputy Martinez's conflict. The parties hereby stipulate that the pretrial motions hearing in this matter should be continued to December 20, 2024, at 8:00 a.m.

IT IS SO STIPULATED.

Dated: November 27, 2024

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

/s/

DIANE ROLDAN
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: November 27, 2024

CUAUHTEMOC ORTEGA
Federal Public Defender

/s/*

HANNAH BOGEN
Deputy Federal Public Defender

Attorneys for Defendant
JONATHAN GONZALEZ

* Pursuant to Local Rule 5-4.3.4, the filing party, Diane Roldán, confirms that this signatory concurs in the filing's contents and has authorized the filing.